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June 16, 2021

The Honorable Cathy Seibel
United States District Court
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Brooklyn Lender LLC v. 53 Stanhope LLC, et al.*, Case No. 07-21-cv-05177-UA,
on appeal from *In re 53 Stanhope LLC, et al.*, Case No. 19-23013

Dear Judge Seibel:

We represent Appellant Brooklyn Lender LLC (“Brooklyn Lender”) in the above-referenced appeal. We write in furtherance of Brooklyn Lender’s June 15, 2021 letter requesting an expedited briefing schedule for the emergency Motion¹ and in response to the D&W Debtors’ response letter proposing an alternative briefing schedule.

The 14-day limited stay period on the effectiveness of the D&W Confirmation Plan expires on June 23, 2021. Counsel for Debtors and Maguire represented to the Bankruptcy Court that the Maguire Exit Financing Facility could close as soon as June 24, 2021. Brooklyn Lender proposed that the Debtors’ response be filed by June 17, 2021, which would provide the Court with sufficient time to issue a decision on the Motion and time for Brooklyn Lender to appeal, in the event that the Court denies the Motion. In contrast, the D&W Debtors’ proposed deadline of June 21, 2021 would leave insufficient time for an appeal, if necessary.

We respectfully request that the Court enter the schedule requested by Brooklyn Lender.

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Brooklyn Lender’s June 15, 2021 letter.

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Sincerely,

/s/ Jennifer S. Recine
Jennifer S. Recine